

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff,  
  
v.  
  
RONALD BARRIOS-GARCIA(06)  
Defendant.

Cr. 97-074-06(DRD)

**MOTION SUBMITTING REQUEST FOR PAYMENT  
BY COURT-APPOINTED COUNSEL (CJA FORM 20)**

TO THE HONORABLE  
DANIEL R. DOMINGUEZ  
UNITED STATES DISTRICT JUDGE  
FOR THE DISTRICT OF PUERTO RICO:

**COMES NOW** the undersigned court-appointed counsel for defendant RONALD BARRIOS-GARCIA(06) and before this Honorable Court respectfully alleges and prays:

1. This Honorable Court previously appointed the undersigned counsel, pursuant to the *Criminal Justice Act*, 18 U.S.C. §§3006A, et seq., to represent defendant RONALD BARRIOS-GARCIA (06) for resentencing after remand from the United States Court of Appeals for the First Circuit in No. 99-2148 on August 23, 2000.

2. In this case, the defendant raised numerous concerns regarding his re-sentencing in light of the opinions of the United States Supreme Court in the cases of *Blakely v. Washington* 542 U.S. 296 (2004) and *Apprendi v. New Jersey*, 530 U.S. 446 (2000) and their progeny, requiring lengthy conferences in which all of defendant's legitimate options were discussed. Further, at the

*United States v. Ronald Barrios-García (06)*  
Cr. 97-074-06 (DRD)

sentencing hearing, issues regarding the scope of resentencing and how the concurrent sentence provision was credited by the United States Bureau of Prisons were considered.

2. That included as attachments hereto is the Form CJA 20 (Appointment of and Authorization to Pay Court Appointed Counsel) and corresponding worksheets, detailing the time dedicated by the undersigned to this case. The amount requested is **\$1,113.20**.

**WHEREFORE**, the Defendant herein prays that this Honorable Court, after due consideration, approve the request for payment attached hereto in the amount of **\$1,113.20**.

**RESPECTFULLY SUBMITTED.**

I hereby CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: AUSA **Sonia Torres** at her electronic address of record.

In San Juan, Puerto Rico, this 4<sup>th</sup> day of October 2006.

BROWN & UBARRI  
El Caribe Building  
Fourteenth Floor  
53 Palmeras Street  
San Juan, P.R. 00901-2417  
Tel.: 787-725-3312  
Fax: 787-723-7233

*s/ David W. Román*

By: David W. Román, Esquire  
USDC No. 125709  
E-Mail: roman@bandulaw.com